

MEMORANDUM ENDORSED



Phone: (718) 971-9474 | **Fax:** (718) 865-0943 | **Email:** Jonathan@Shalomlawny.com
Office: 105-13 Metropolitan Avenue Forest Hills, New York 11375

VIA ECF & E-MAIL

United States District Court
Southern District of New York
Attn: Gregory H. Woods, U.S.D.J.
500 Pearl Street, Courtroom 12C
New York, NY 10007-1312
woodsnyisdchambers@nysd.uscourts.gov

January 20, 2022

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Re: Molina v. Hornblower Group, Inc., *et al.*
Case No.: 1:20-cv-10821 (GHW) (OTW)
Letter Motion for Extension of Time to Oppose Motion for Summary Judgment

This office represents the Plaintiff in the above-referenced case. Plaintiff writes with the consent of Defendants to respectfully request a ten (10) day extension of time until Friday, February 4, 2022 to submit opposition papers to Defendants' motion for summary judgment (with a reciprocal extension for Defendants to submit reply papers in further support). For the reasons set forth below, Plaintiff submits that good cause exists to grant the requested extension of time.

Pursuant to ¶ 1(E) of this Court's Individual Rules of Practice in Civil Cases (hereinafter the "Court's Rules"), Plaintiff submits that: (1) the current deadline for the submission of opposition papers is Wednesday, January 26, 2022; (2) there have been no previous requests for an extension of this deadline; (3) the reason for the request is because the Plaintiff is currently traveling and is unable to continue participating in the preparation of opposition papers and, in addition, because your undersigned will be traveling this weekend, as well; (4) the adversaries consent to this request so long as a reciprocal extension for Defendants to submit reply papers by Monday, February 14, 2022 is granted, to which Plaintiff consents; and (5) no proposed Revised Civil Case Management Plan and Scheduling Order is necessary.

Given the foregoing circumstances, Plaintiff respectfully submits that good cause exists to grant the requested extensions of time. See Fed. R. Civ. P. 6(b)(1)(A). Accordingly, Plaintiff submits that his instant letter motion be granted.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Forest Hills, New York
January 20, 2022

Respectfully submitted,

SHALOM LAW, PLLC

/s/ Jonathan Shalom

Jonathan Shalom, Esq.
10513 Metropolitan Avenue
Forest Hills, NY 11375
(718) 971-9474 (office)
(718) 865-0943 (facsimile)
jonathan@shalomlawny.com


Attorneys for Plaintiff

Application granted. The deadline for Plaintiff to file its opposition to Defendants' motion is extended to February 4, 2022. Defendants' replies, if any, are due no later than seven days following the date of service of Plaintiff's oppositions.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 41.

SO ORDERED.

Dated: January 20, 2022
New York, New York



GREGORY H. WOODS
United States District Judge